

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	:
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CITY OF DETROIT, MICHIGAN,	:
	:
Debtor.	:
	:
	:
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	Chapter 9
	Case No. 13-53846
	Hon. Steven W. Rhodes

**THE DETROIT POLICE OFFICERS ASSOCIATION’S
AND DETROIT FIRE FIGHTERS ASSOCIATION’S AMENDED LIST
OF FACT WITNESSES RELATED TO THE
PROPOSED PLAN FOR THE ADJUSTMENT OF DEBTS**

Detroit Police Officers Association (the “DPOA”) and the Detroit Fire Fighters Association (the “DFFA”), by their attorneys, Erman, Teicher, Zucker & Freedman, P.C., and in accordance with this Court’s Fourth Amended order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment [Docket No. 4202] (the “Scheduling Order”) and the status conference held by this Court on Thursday, May 15, 2014, hereby submit their amended list of fact witnesses and identify the subject that each witness will address:

1. The DPOA and DFFA identify the following individuals, exclusive of those to be offered for rebuttal purposes, as fact witnesses that they may call at the hearing on the proposed plan for the adjustment of the City's debts (the "Plan")

- a. Mark Diaz, DPOA President – will call
- b. Bernard Cybulski, DPOA Vice President – may call
- c. Jeffrey Pegg, DFFA President – will call
- d. Teresa S. Sanderfer, DFFA, Vice President – may call

The foregoing witnesses may testify on issues related to feasibility and the ability of the City to execute its Plan of Adjustment, including its ability to provide effective police and fire services to the City.

- 2. 30(b)(6) designee of City or Retirement Systems to address different pension formulas on Plan Exhibit Exhibit I.A.191.b
- 3. Nancy Ciccone, Research Analyst, Police Officers Labor Council – may call.

The foregoing witness may testify to police salaries in comparably distressed Michigan cities in the event evidentiary challenges are made to the factual findings on that issue in the DPOA's March 25, 2013 Act 312 Award, PSU Eligibility Trial Exhibit 706.

4. Both the DPOA and DFFA reserve the right to call and cross-examine any witnesses listed by the City, the Retirement Systems, the Retiree Committee, the DPLSA, the DPCOA, and/or any other objecting party.

5. Both the DPOA and DFFA reserve the right to supplement the testimony topics associated with each witness referenced above, and reserve the right to supplement their list of fact witnesses as may be necessary.

ERMAN, TEICHER, ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek

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Dated: May 16, 2014

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 16, 2014 the Detroit Police Officers Association's and Detroit Fire Fighters Association's List of Fact Witnesses Related to the Proposed Plan for the Adjustment of Debts was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to the Debtor and to all attorneys and parties of record registered electronically.

/s/ Barbara A. Patek
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Dated: May 16, 2014